

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In re Petition of National)
Telecommunications and Information)
Administration to Amend Part 25 of the)
Commission's Rules to Establish)
Emissions Limits for Mobile and Portable)
Earth Stations Operating in the)
1610-1660.5 MHz Band with respect to)
Radio-Navigation Satellite Systems)
Operating at 1559-1610 MHz)
_____)

RM-9165

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY COMMENTS

Pursuant to Section 1.405 of the Commission's Rules, L/Q Licensee, Inc. ("LQL"), by its undersigned attorneys, hereby responds to the comments submitted on the Petition for Rulemaking of the National Telecommunications and Information Administration ("NTIA").¹ The NTIA's Petition seeks to establish rules for out-of-band emissions limits for mobile and portable earth stations ("METs") communicating with space stations operating in the 1610-1660.5 MHz band to protect receivers of the United States' Global Positioning System ("GPS") and Russia's GLONASS system.

The parties filing comments in this proceeding raised a number of important issues which should be included in any "Notice of Proposed Rulemaking" for adoption of the out-of-band emissions limits. For example, AMSC

¹ Comments were filed by AMSC Subsidiary Corporation, Constellation Communications, Inc., COMSAT Corporation, Motorola Satellite Communications, Inc., and LQL.

and COMSAT both raised the issue of how the new limits would apply to METs already authorized. See AMSC Comments, at 11-13; COMSAT Comments, at 5. There were also questions whether the limits should be applicable at all in maritime areas away from airports, see COMSAT Comments, at 6-9, and whether METs which comply with even more stringent limits should be exempt from regulations associated with the time-phased approach proposed by NTIA, see Motorola Comments, at 4-6.

Motorola pointed to a number of technical issues which must be resolved before precise rules can be adopted. See Motorola Comments, at 6-8. And, AMSC and Constellation discussed the information which the Commission should consider in determining appropriate out-of-band emissions limits to protect GPS and GLONASS. See AMSC Comments, at 14-17; Constellation Comments, at 2-4.

All of these parties raise important issues, and, LQL recommends inclusion of these issues in any NPRM on protection requirements for GPS and GLONASS. While certain parties object to the specific limits proposed by NTIA, none objects to the Commission moving forward to initiate a proceeding to consider the issues. Accordingly, LQL recommends that the Commission initiate such a proceeding so the questions raised in the comments can be addressed.

As the Commission is aware, many of the issues mentioned in the comments have been considered previously by the MSS Above 1 GHz Negotiated Rulemaking Committee ("NRC"), the RTCA, Inc. and the ITU, and extensive records have been compiled in those fora on the issues. In order to avoid duplication of effort in a

future proceeding, LQL recommends that the Commission incorporate by reference the NRC report, the RTCA report, and papers from the ITU into the record for any NPRM derived from this proceeding. Incorporating these materials will help expedite the Commission's rulemaking process by giving all interested parties the benefit of prior work on these emissions limits.

Accordingly, for the reasons set forth in its initial comments and above, LQL recommends that the Commission grant the Petition and establish an expedited schedule to adopt out-of-band emissions levels for METs operating in the 1610-1660.5 MHz band.

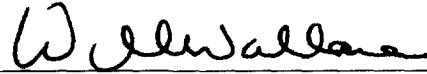
Respectfully submitted,

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Date: December 23, 1997

CERTIFICATE OF SERVICE

I, William D. Wallace, hereby certify that I have on this 23rd day of December, 1997, caused copies of the foregoing "Reply Comments" to be delivered via hand delivery (indicated with *) or by U.S. mail, postage prepaid, to the following:

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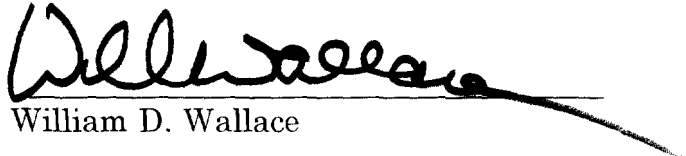
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